

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

**PLAINTIFFS-JUDGMENT CREDITORS' SECOND SET OF INTERROGATORIES TO  
DEFENDANT-JUDGMENT DEBTOR PALESTINE LIBERATION ORGANIZATION  
("PLO") RELEVANT TO THE PLO'S RULE 60(b)(6) MOTION**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiffs–Judgment Creditors, by counsel, serve Defendant–Judgment Debtor the Palestine Liberation Organization (“PLO”) with the following interrogatories, which the PLO shall answer under oath and in writing pursuant to the requirements of the Federal Rules of Civil Procedure and the Local Rules of this Court within thirty (30) days of the service of these interrogatories.

**INSTRUCTIONS**

1. The phrasing of these interrogatories shall be construed so as to make your responses inclusive rather than exclusive. For example: (a) the word “including” is intended to be comprehensive and means “including but not limited to”; (b) the singular form of all words includes the plural form and the plural form of all words includes the singular form; (c) the words “and” and “or” shall be interpreted as both conjunctive and disjunctive; (d) the word “any” shall mean “any and all”; and (e) the word “each” shall mean “each and every.”

### **GENERAL DEFINITIONS**

1. “Relate to” or “relating to” shall mean and include constituting, discussing, mentioning, containing, embodying, reflecting, identifying, incorporating, referring to, dealing with, or pertaining to in any way.

### **SPECIFIC DEFINITIONS**

1. “PA” shall mean and refer to defendant The Palestinian Authority.
2. “PLO” shall mean and refer to defendant The Palestine Liberation Organization.
3. “Defendants” shall mean and refer collectively to Defendants PA and PLO.
4. “Cairo Agreement” shall mean and refer collectively to any and all written and/or oral agreements, declarations, understandings and/or pacts that were made, reached and/or concluded on or about December 21, 1995, to which either of the Defendants and Hamas were parties.

### **INTERROGATORIES**

#### **Interrogatory No. 3**

In respect to the Cairo Agreement provide (a) the full and complete word-for-word Arabic text of the Cairo Agreement (b) the full names and current addresses of all persons who participated in the negotiation and drafting of the Cairo Agreement and of all persons who signed and or executed the Cairo Agreement on behalf of either Defendant (c) the titles and full descriptions of all positions, offices and/or jobs in the PA and/or PLO held by the persons referenced in the previous subsection between December 1, 1995 and July 13, 2004, including all responsibilities and authority held by such persons by virtue of those positions, offices and/or jobs and (d) the titles and full descriptions of all positions, offices and/or jobs in the PA and/or

PLO currently held by the persons referenced in subsection (b), including all responsibilities and authority held by such persons by virtue of those positions, offices and/or jobs.

**Interrogatory No. 4**

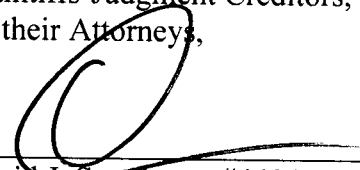
In respect to the Letter of Request issued in this matter on August 9, 2010 (dkt. # 505): describe in full detail (a) all actions taken by the PA to cause the State of Israel to provide the assistance sought in that Letter of Request (b) all actions taken by the PLO to cause the State of Israel to provide the assistance sought in that Letter of Request (c) all communications and correspondence between the PA and the State of Israel and/or any agency or instrumentality thereof (including any official or employee of the State of Israel and/or any agency or instrumentality thereof) regarding the Letter of Request and (d) all communications and correspondence between the PLO and the State of Israel and/or any agency or instrumentality thereof (including any official or employee of the State of Israel and/or any agency or instrumentality thereof) regarding the Letter of Request.

**Interrogatory No. 5**

In respect to the sentence “The counsels [sic] of the PA are also taking the necessary legal steps to counter such assaults” appearing in Mahmoud Abbas’ November 28, 2006 letter to Secretary of State Condoleezza Rice: (a) provide the full names and addresses of all persons and/or law firms included in the phrase “The counsels of the PA” (b) provide the dates on which such persons and/or law firms first became “The counsels of the PA” and (if applicable) ceased to be “The counsels of the PA” and (c) describe in full detail the “necessary legal steps to counter such assaults” that were taken.

Dated: October 19, 2010

Plaintiffs-Judgment Creditors,  
by their Attorneys,



---

David J. Strachman #4404  
McIntyre, Tate & Lynch LLP  
321 South Main Street, Suite 400  
Providence, RI 02903  
(401) 351-7700  
(401) 331-6095 (fax)  
djs@mtlesq.com

Max Wistow #0330  
Wistow & Barylick, Inc.  
61 Weybosset Street  
Providence, RI 02903  
(401) 831-2700  
(401) 272-9752 (fax)  
mw@wistbar.com

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on October 19, 2010, a true copy of the foregoing was sent by first class mail and electronic mail to Defendants' counsel of record listed below:

Richard A. Hibey  
Mark J. Rochon  
Brian Hill  
Miller & Chevalier Chartered.  
655 Fifteenth Street, N.W., Suite 900  
Washington, DC 20005-5701

  
\_\_\_\_\_  
David J. Strachman

I HEREBY FURTHER CERTIFY that, on October 19, 2010, a true copy of the foregoing was hand delivered and sent via electronic email to Defendants' counsel of record listed below:

Deming E. Sherman  
Edwards Angell Palmer & Dodge LLP  
2800 Bank Boston Plaza  
Providence, RI 02903

  
\_\_\_\_\_  
David J. Strachman